



Fw: EPA Audit Policy Review for PCC Structural, Inc. (Information Needed)

Kelly Huynh to: Laurie Kral

08/31/2010 10:07 AM

Laurie,

Please assure that a hard copy of this email correspondence regarding the PCC Structural TRI self disclosure is in the file.

Thank you.

Kelly Huynh
Manager, Inspection and Enforcement Management Unit
EPA Region 10
1200 - 6th Avenue, Suite 900, OCE-164
Seattle, WA 98101
206/553-1679
fax 206/553-4743



----- Forwarded by Kelly Huynh/R10/USEPA/US on 08/31/2010 10:05 AM -----

From: "Tichenor, Geoffrey" <GBTICHENOR@stoel.com>
To: Barry Porter/R10/USEPA/US@EPA
Cc: Kelly Huynh/R10/USEPA/US@EPA
Date: 07/30/2010 03:42 PM
Subject: RE: EPA Audit Policy Review for PCC Structural, Inc. (Information Needed)

Good afternoon, Mr. Porter,

Thank you for your email and for discussing the status of PCC Structural, Inc.'s ("Structural") April 30, 2010 voluntary self-disclosure of EPCRA violations.

Thank you as well for confirming (during our conversation this morning) that the Structural's facilities are authorized to take up to 60 days after Fisher & Arnold (the auditor) completes its audit report to correct any violations identified, including the potential violations self-disclosed to EPA on April 30. As we discussed, Fisher & Arnold expects to complete its final report shortly (in the next week or two).

Finally, thank you for clarifying that, in light of Structural's April 30 self-disclosure letter and follow-up correspondence, EPA only needs Structural to complete the first two pages of the "Audit Policy Eligibility Checklist" that was attached to your email from this morning.

Structural would like until Friday, August 20, 2010 to provide its responses to the first two pages of the Checklist to EPA. We are making this request because the second page of the Checklist will require us to summarize the results of Fisher & Arnold's audit report which, while nearly complete, is not yet final. In addition, key members of Structural's self-disclosure team will be out of the office on family vacations during the first two weeks in August. For both of these reasons, we would sincerely appreciate if EPA will allow us until August 20 to submit our response to the Checklist. We look forward to

your response to this request.

Please contact me if you have further questions about Structurals' self-disclosure and EPCRA audit.

Sincerely,

Geoff Tichenor

Geoffrey B. Tichenor
STOEL RIVES LLP | 900 SW Fifth Ave, Suite 2600 | Portland, OR 97204-1268
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-----Original Message-----

From: Porter.Barry@epamail.epa.gov [mailto:Porter.Barry@epamail.epa.gov]
Sent: Friday, July 30, 2010 10:04 AM
To: Tichenor, Geoffrey
Subject: EPA Audit Policy Review for PCC Structurals, Inc. (Information Needed)

Mr. Tichenor,

While reviewing information to complete PCC Structurals, Inc. EPA Audit Policy information, we noticed that they have not provided enough adequate information for us to complete this process. Complete documentation is necessary to satisfy the nine criteria listed in the Audit Policy.

Attached is a checklist which can be completed and sent back to me (also cc Graham Kirn to kirn.graham@epamail.epa.gov) in order to comply with the Audit Policy criteria and aid us in completing the review.

If you have any questions please do not hesitate to email or give me give me a call,

Barry Porter, Jr.
Office of Compliance and Enforcement
U.S. EPA Region 10
1200 6th Ave, Suite 900
Seattle, WA 98101
(206)553.6390 ext. 3-6390
porter.barry@epamail.epa.gov

(See attached file: zAudit Policy Checklist.doc)



Re: PCC Structurals' Self-Disclosure 
Kelly Huynh to: Tichenor, Geoffrey
Bcc: Laurie Kral

10/06/2010 03:27 PM

Geoffrey,

Yes, PCC Structurals has received an extension until October 18th to complete it's corrective action regarding several self disclosures recently submitted to EPA Region 10. Thank you for your continued communications regarding this matter.

Kelly Huynh
Manager, Inspection and Enforcement Management Unit
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"Tichenor, Geoffrey"

Dear Kelly,

10/06/2010 02:47:56 PM

From: "Tichenor, Geoffrey" <GBTICHENOR@stoel.com>
To: Kelly Huynh/R10/USEPA/US@EPA
Date: 10/06/2010 02:47 PM
Subject: PCC Structurals' Self-Disclosure

Dear Kelly,

Thanks for taking my call earlier. I'm sending you this email because I'm always paranoid that things could go wrong when I say my email address over the phone.

The purpose of this email is to confirm that, consistent with EPA's Audit Policy, you agreed to provide PCC Structurals a one-week extension, until October 18, 2010, to complete the corrective actions resulting from its recent, voluntary TRI audit of the Structurals' facilities.

Please let me know that received this email and approved my request to extend the corrective action deadline by one week, until October 18, 2010.

Thanks very much.

Geoff

Geoffrey B. Tichenor
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printed by: Laurie Kral, 11/10/2010, 01:35:12 PM

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